

ONE STOP OPERATOR/FISCAL AGENT ISSUANCE 2004-6, Mod. 2

DATE: September 7, 2005
TO: FEC Staff
FROM: Clyde McQueen, President/CEO
SUBJECT: Classroom Occupational Skill Training; On-the-Job Training, and Internships for Adults and Dislocated Workers and Dual Enrollment Procedures
EFFECTIVE DATE: September 1, 2005

Deleted: January 16, 2002

BACKGROUND: This issuance is based on the Workforce Investment Act, the final WIA Regulations issued August 11, 2000, and FEC policy.

ACTION: FEC staff and contractors should add this issuance to their Policy and Procedures Manuals. *This modification indicates the scores required on the WorkKeys test, and deletes the TABE test.*

QUESTIONS: If you have any questions, please contact Shelley Estell, Ext. 299, or Peggy Martinez, Ext. 239.

The chart below provides an overview of the allowable amounts and time periods for the various program activities.

Program Activity	Maximum Amount	Time Period
Classroom Training	\$4,000	May exceed 12 months with President
	\$6,000 w/President/Designee approval	and designee approval
	\$10,000 – NEG w/President/Designee Approval (American Airlines)	May exceed 12 months with President and designee approval
On-the-Job Training	\$4,000	Minimum 4 weeks or 160 hrs;
		Average time period is 6 weeks or 240 hrs;
		Maximum time period is 12 weeks or 480 hrs
Internships	\$4,000	Minimum 4 weeks or 160 hrs;
		Average time period is 8 weeks or 320 hours;
		Maximum time period is 12 weeks or 480 hrs

NOTE: The \$10,000 ceiling on classroom training is for the American Airlines NEG which is for a two-period only, and does not apply to any other NEG or program.

I. CLASSROOM OCCUPATIONAL SKILL TRAINING

ADULTS AND DISLOCATED WORKERS: Classroom occupational skill training is considered a *training service* under the Workforce Investment Act for adults and dislocated workers.

1. Recommendation of Clients for Training Services: Prior to receipt of a training service, a documented intensive service must have been received by the client. Clients must have already attended orientation; completed the FA eligibility session; registered in Missouri Works; and completed an IEP prior to being enrolled in a training service. In addition, the IEP should indicate that the client was unable to obtain self sustaining employment through core and intensive services and, consequently, is being recommended for training services. **The Enrollment Committee must approve the enrollment of the client prior to the client starting classroom occupational skill training.**

Classroom Occupational Skill Training must be **full time** (as defined by the school); **DESE approved**; and must lead to a **certificate** (credential). ***The length of the Classroom Occupational Skill Training may exceed 12 months if the training is in a demand occupation as identified by the Missouri Economic Research and Information Center (MERIC) and is approved by the President/CEO or his designee.***

2. Tests and Forms: Applicants will be required to complete the following forms and tests:

- Application for Intensive and Training Services
- Individual Employment Plan – IEP
- **WorkKeys Test:** Clients must score the following minimum levels on the WorkKeys test in order to be considered for classroom training. Higher scores on the WorkKeys may be required based on the occupations selected by the clients.
Minimum Scores: Clients without a HS diploma or GED certificate must score a level 4 on the reading and math tests **AND** enroll in ABE/GED training concurrent with their enrollment in classroom training **OR** have a HS diploma or GED **AND** pass the WorkKeys Test at a level 3.
- **The CDE will recommend clients for training level activities via the Obligation Form.**

3. Contractors

Contractors may refer clients via the #175 Referral Form to FEC for training services, including on-the-job training and classroom occupational skill training. **Full Service Contractors**, West Central Missouri Community Action Agency and Project Refocus, may recommend clients for training services by following the procedures as outlined in this issuance.

4. Individual Training Accounts: The Career Development Executive (CDE) will provide an orientation to the client on the requirements for participation in classroom occupational skill training and receipt of an Individual Training Account (ITA) voucher to ensure customer choice. The web site for approved training providers – www.greathires.org/mech – should be shared with the client as well as the labor market information regarding occupational demand so that the client can research eligible training providers and make an informed choice. **(Please refer to related issuances: Issuance 2000-10, Individual Training Accounts and Issuance 2000-17, Eligible Training Providers).**

Deleted: k12apps.dese.state.mo.us/webapps/login.asp

5. Forms. Upon approval of the training by the Manager, the CDE will prepare an ITA Enrollment Packet comprised of the following documents, so that it can be submitted to Fiscal Department at least five (5) days prior to the training start date to verify the availability of funding:

Enrollment Forms (CDE)

- Support Services Request (if applicable)
- Transition to Placement Form

Classroom Skill Training Forms

- DESE 6/6A
- ITA Financial Aid Voucher
- B-Form

The client will be given the original Individual Training Account Voucher which must be used at the designated facility within 45 days.

Obligation/Fiscal Forms

- Obligation/Deobligation Form (*CDE completes and which now includes the recommendation for training services*).

6. Monitoring Client's Progress: The CDE is responsible for monitoring the client's progress and attendance during classroom training and will contact the student at home and the instructor each week, and visit the client on-site, as needed. Additionally, the CDE will maintain the monthly attendance sheets as prepared by the training institution.

7. Transition to Placement: The assigned Workforce Development Executive (WDE) will receive the ***Transition to Placement Form*** from the CDE along with the projected classroom completion dates approximately **30 days** prior to the client's completion of classroom training. Upon completion of classroom training, the client will start job search activities with the assistance of the Career Placement Specialist or WDE.

8. Maximum Dollar Amount: The ***maximum*** dollar amount to be paid from WIA for classroom occupational skill training for adults is **\$4,000**. **This amount is subject to budget availability, is NOT an entitlement, and will vary dependent upon training area. This amount may be increased up to \$6,000 by obtaining the written approval of the President/CEO or his designee. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding.**

Dislocated Workers: Dislocated workers served through National Emergency Grants (NEG) may be dually enrolled in the formula dislocated worker program and a National Emergency Grant based on the needs of the client and approved by the President/CEO. The maximum amount for classroom training for NEG American Airlines is \$10,000, and must be approved by the President/CEO or his designee.

9. PELL Grant: Clients recommended for enrollment in classroom occupational skill training must first apply for a PELL grant or other types of financial aid. Upon receipt of the PELL grant, grant funds will first be applied to the tuition. ***Receipt of PELL grant funds should be noted in the Comment Section of the DESE-6.***

10. Support Services: Clients attending classroom occupational skill training are NOT eligible to receive support services, but may receive ***needs based payments*** based on need. Please refer to the latest

support services issuance 2001-08. **CONTRACTORS** shall access support services for their clients through FEC.

II. ON-THE-JOB TRAINING (OJT)

ADULTS AND DISLOCATED WORKERS: On-the-job training is considered a *training service* under the Workforce Investment Act for adults and dislocated workers.

1. **Recommendation of Clients for Training Services:** Prior to receipt of a training service, a documented intensive service must have been received by the client. Clients must have already attended orientation; completed the FA eligibility session; registered in Missouri Works; and completed an IEP prior to being enrolled in a training service. In addition, the IEP should indicate that the client was unable to obtain self sustaining employment through core and intensive services and, consequently, is being recommended for training services. [Documentation of the recommendation for training services will be notated on the Obligation Form.](#) The Enrollment Committee must approve the enrollment of the client prior to the client starting on-the-job training.

2. **Contractors:**

Contractors may refer clients via the #175 Referral Form to FEC for training services, including on-the-job training and classroom occupational skill training.

Full Service Contractors, *West Central Missouri Community Action Agency and Project Refocus*, may recommend clients for training services by following the procedures as outlined in this issuance.

3. **Training Overview and Documentation of Need:** The WDE will provide the client a general orientation to training services including a description of the requirements for participation in OJT. The CDE will review the [IEP](#) with the client and document the need for on-the-job training, and indicate that the client has a reasonable expectation of completing the OJT. Clients recommended for on-the-job training, should have a minimum of 6 months consecutive work experience.

4. **Forms:** The CDE will complete the *Obligation Form* and submit same to the Manager for approval. OJT forms include the following:

Enrollment Forms (CDE)

- Support Services Request (if applicable)
- Transition to Placement Form

OJT Forms (WDE)

- Memorandum of Agreement
- Employment and Training Strategy
- Debarment Disclosure Form
- Employer Profile
- Job Order Form

Obligation/Fiscal Forms

- Obligation/Deobligation Form (*CDE*)

- Worksite Monitoring Report (to be completed by the WDE every 2 weeks throughout the training period). The WDE should share the results of the monitoring with the CDE.
- Verification of Employment Form (*WDE*)

5. **Training Plan and Forms:** The assigned WDE will receive the ***Transition to Placement Form*** from the CDE. The Transition to Placement Forms are to be completed by the CDE after the CDE recommends the client for OJT.

The client will meet weekly with the Career Placement Specialist or WDE to obtain on-the-job training leads. Once an OJT position is identified, the WDE will complete the **Training Plan Package** which includes the routing slip; 3 original training plans signed by the employer and the client; memorandum to the file; [Registration in Toolbox](#); [Printout from Toolbox showing Program Activities](#); and the Obligation/Deobligation Approval form.

The WDE should submit the Training Plan Package to the Manager no later than **5 days prior to the OJT start date**. The manager will forward the package to the VP for approval who will submit the package to the President/CEO for signature. The President's secretary will route the Training Plan Package to the unit secretary for assignment of a MOA number for the training plan, and enter the training plan into the MOA data base. The unit secretary will mail the original training plan to the employer; file one training plan in the unit's files; and the third original is maintained by Fiscal.

Upon completion of OJT training, the original Training Plan will be signed by the client and the employer. The WDE will submit a copy of the signed Training Plan along with the OJT reimbursement paperwork to the Manager for approval who will submit same to the Vice President for approval and submission to Fiscal for payment.

6. **WDE Responsibilities:** The WDE will develop a *Memorandum of Agreement* (3 original copies) with the employer which lays out the responsibilities of the FEC and the employer and which is a non-binding contract with the employer. The WDE completes the following forms:

- *Employment and Training Strategy:* details the employer's employment and training needs and strategies for meeting those needs.
- *Debarment Disclosure Form.*
- *Employer Profile:* provides a description of the employer and employment opportunities.

A *Job Order Form* is to be completed by the employer for each job to be filled. During training, the WDE will complete bi-monthly *OJT Worksite Monitoring Reports*, and submit same to the CDE for the client's file.

7. **Toolbox:** The CDE will enter the client in the OJT Activity in Toolbox after the client completes the first day of OJT employment.

8. **Maximum Dollar Amount and Minimum and Maximum Time Periods:** The **maximum** dollar amount to be paid from WIA for on-the-job training for adults is \$4,000. This amount is subject to budget availability, is NOT an entitlement, and will vary dependent upon training area. This amount may be increased up to \$6,000 by obtaining the written approval of the President/CEO or his designee. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding.

Dislocated Workers: Dislocated workers served through National Emergency Grants (NEG) may be dually enrolled in the formula dislocated worker program and a National Emergency Grant based on the needs of the client and approved by the President/CEO. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding.

Time Periods: The minimum time period is 4 weeks or 160 hours; the average time period is 6 weeks or 240 hours; and the maximum time period is 12 weeks or 480 hours; however, the length of the OJT may vary based on three factors: the difficulty of the job, previous work experience, and the client's education. Variance from the normal time periods require the approval of the President/CEO or his designee.

9. OJT Reimbursement Process and Extension Policy: After an OJT client completes training, which is the total number of hours outlined on the training plan plus 4 weeks of retention for adults/dislocated workers, the employer may be eligible for the wage reimbursement amount obligated on the training plan. ***The amount obligated for OJT shall not exceed \$4,000 (Exception: \$6,000 with President/CEO or designee approval).***

The original reimbursement packet is to be submitted to Fiscal, and a copy maintained by the WDE. The ***reimbursement package*** must contain the following information:

- Reimbursement coversheet
- Actual Cost Reimbursement sheet
- Signed training plan that documents the client acquired the skills outlined in the training plan
- Worksite Monitoring Report (to be completed by the WDE every 2 weeks throughout the training period). The WDE should share the results of the monitoring with the CDE.
- Completed and signed OJT invoices which indicate the actual hours worked to verify that all training hours have been completed along with the retention period.
- Payroll documentation reflecting gross and net wages.

Issuance 99-7, Change 1, provides a detailed outline of FEC's OJT Reimbursement Policy and OJT Contract Extension Procedures.

10. Support Services: Clients who attend on-the-job training may be eligible for support services such as work-related clothing, tools, and equipment, child care/family care, and transportation for up to 30 days during the client's first month of employment. Issuance 2001-08 provides additional information on support services, needs based payments, and payments for goal attainment. Support services provided will be based upon the needs of the client, and must be documented in the EPS.

Contractors: Contractors shall access support services for their clients through FEC.

III. INTERNSHIPS

Work Experience and/or an Internship is considered to be an *intensive service* under WIA for *adults and dislocated workers*.

1. Recommendation of Clients for Intensive Services: Prior to receipt of an intensive service, a documented core service must have been received by the client. Clients must have already attended orientation; completed the FA eligibility session; registered in Missouri Works; and completed an IEP prior to being enrolled in an internship/work experience. In addition, the IEP should indicate that the client was unable to obtain self sustaining employment through core services and, consequently, is being recommended for intensive services. **The Enrollment Committee must approve the enrollment of the client prior to the client starting an internship.**

2. Contractor Referral of Clients for Internships: Contractors may refer clients via the #175 Referral Form to FEC for internships.

The Cass County Contractor should develop internships directly for their clients rather than referring the clients to the Full Employment Council, but must follow the procedures as outlined in this issuance.

3. Internships: Internships must be with private companies, and should include a *commitment from the employer to hire* the client at the end of the training, whereas, **work experience** may be with public and/or not for profit companies may or may not include a commitment to hire.

Clients for whom internships are recommended usually have limited work experience (*less than 6 months in the occupational field*) and/or have just completed classroom occupational skill training and are in need of additional training. Clients completing internships shall receive a credential. Internships developed for dislocated workers shall be in an occupational field other than their dislocation occupation.

The average number of hours for an internship is **320 hours**; the minimum hours for an internship is **160**; and the maximum number of hours is **480**. Variance from the normal time periods require the approval of the President/CEO or his designee. *Weekly hours may not exceed 40 hours, since clients will not be paid for overtime.* The internship hours and wage rate should be negotiated with the employer based on the needs of the client; the client's education, training, and prior work experience; and the difficulty of the job. If a client works more than 6 hours per day, the client must take a minimum of a half hour **unpaid** lunch break.

Clients who are concurrently working on their GED, may be placed in part-time internship with the approval of their case manager and manager.

4. Forms: Internship forms include the following:

Enrollment Forms (CDE)

- Support Services Request (if applicable)
- I-9 and documentation
- B-Form
- Medical Information Form
- W-4 Forms (Missouri and Federal)

Internship Forms (WDE)

- Training Plan (3 original copies)
- Internship Agreement/Work Experience Agreement (3 original copies)

Obligation/Fiscal Forms

- Obligation/Deobligation Approval Form (*CDE*)
- Worksite Monitoring Report (to be completed by the WDE every 2 weeks during the internship). The WDE should share the results of the monitoring with the CDE.

5. Maximum Dollar Amount: The maximum dollar amount to be paid from WIA for internships is \$4,000. This amount is subject to budget availability, is NOT an entitlement, and will vary dependent upon the training area. This amount may be increased up to \$6,000 by obtaining the written approval of the President/CEO or his designee. The request for approval to exceed the maximum training amount shall include a statement as to the need for additional funding.

6. Support Services: Clients participating in internships or work experience may be eligible for support services such as work-related clothing, tools, and equipment, child care/family care, and transportation for up to 30 days during the client's first month of employment. Issuance 2001-08 provides additional information on support services, needs based payments, and payments for goal attainment. Support services provided will be based upon the needs of the client, and must be documented in the IEP.

Contractors shall access support services for their clients through FEC.

IV. DUAL ENROLLMENT OF CAP CLIENTS WHOSE TRAINING IS FUNDED THROUGH NON-WIA SOURCES

A. ELIGIBILITY REQUIREMENTS: Clients may be dually enrolled in CAP and other programs. If a CAP client is to be dually enrolled in the WIA program, the eligibility requirements for the WIA program must be met. A CAP recipient will meet the *income* eligibility requirements for WIA, but the following general eligibility criteria must be documented:

- ☐ Social Security Number
- ☐ Date of Birth/Age
- ☐ Current Address
- ☐ Citizenship/Alien Status (Work Authorization Status)
- ☐ Selective Service Status (Males born after 12/31/59)

CAP CLIENTS: It is not necessary for CAP clients referred by FSD to go through *Eligibility*. Clients should be looked up in Toolbox and, if TA approved, referred to the TANF case management unit for services.

B. OTHER CRITERIA TO REVIEW BEFORE DUALY ENROLLING A CAP CLIENT INTO WIA

Only those CAP clients who are likely to achieve the WIA performance standards of *entered employment* and *earnings change* or *earning replacement* should be dually enrolled in WIA – Adult, or WIA-Dislocated, or WIA – Older Youth. In addition, adult and dislocated worker clients enrolled in training must receive a *credential*, and all older youth clients must receive a *credential*.

CAP clients who have been enrolled in OJT, Subsidized-Private Sector, or Subsidized-Public Sector, or who have completed classroom training are prime candidates for dual enrollment.

Core Placements: The enrollment should occur prior to the client being placed in unsubsidized employment, but no later than **60 days after they have been certified WIA eligible**.

C. PROCEDURES FOR DUAL ENROLLMENTS

Dual enrollment of CAP clients in a WIA program MUST BE APPROVED by the Manager prior to submission to the Enrollment Committee for approval. Dual enrollments should be documented in the TIRE in Toolbox.

CAP clients, ages 19 – 21, may also be dually enrolled in the YOG program if they reside in the EEC (Empowerment Zone).

If a client is to be dually enrolled in WIA, but the training is to be funded through source(s) other than WIA or other FEC funding sources, then clients:

- ☐ **DO NOT** have to complete *WorkKeys*, *TABE* or *Career Scope* to be dually enrolled under WIA.

- ❑ **DO NOT** have to meet the “*Ability to Benefit from Training*” requirements as outlined under Section IV of the *Enrollment Checklist*.
- ❑ **Can** substitute a CAP Individual Employment Plan (IEP) for the WIA **Individual** Employment Plan (**IEP**), but must submit the IEP to the Enrollment Committee along with a ***Screen Print of the CAP Activity Screen in Toolbox***.
- ❑ **DO** have to complete the “*Adult Application for Intensive and Training Services*” which does not require the Officer’s signature under the CAP program.
- ❑ **DO** have to complete a ***Status Change Form*** enrolling them in the appropriate WIA Activity.
- ❑ **Must have** completed over 50 percent of their scheduled CAP activities. And, if a client is enrolled in a training activity, their scheduled date of completion must be no later than June 15.

<i>ADULT/DISLOCATED – PLACEMENT IS GOAL</i>
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CAP Work Activities	WIA Activity Codes
❑ On-the-Job Training	o 302 On-the-Job Training
❑ Subsidized Private-Sector Employment	o 210 Internship
❑ Subsidized Public – Sector Employment	o 210 Internship
❑ Unsubsidized Employment	o Core Placement

<i>ADULT/DISLOCATED – PLACEMENT AND CREDENTIAL IS GOAL</i>

CAP Work Activities	WIA Activity Codes
❑ Vocational Education/Occupational Training	o 301 Classroom Occupational Skill Training
❑ On-the-Job Training	o 302 On-the-Job Training
❑ Subsidized Private-Sector Employment	o 302 On-the-Job Training
❑ Subsidized Public – Sector Employment	o 302 On-the-Job Training

Since all Older Youth must attain a credential, there is no option for “Placement Only” as a goal.

<i>OLDER YOUTH (Ages 19 – 21) – PLACEMENT AND CREDENTIAL IS GOAL</i>

CAP Work Activities	WIA Activity Codes
❑ Vocational Education/Occupational Training	o 505 Classroom Occupational Skill Training
❑ On-the-Job Training	o 504 Work Experience
❑ Subsidized Private-Sector Employment	o 504 Work Experience
❑ Subsidized Public – Sector Employment	o 504 Work Experience

NOTE: It is FEC’s policy that an older youth must have a HS diploma or GED to be dually enrolled.

<i>WIA CODES FOR ADULTS AND DISLOCATED WORKERS</i>

- The following codes should be [selected for use in Toolbox](#):

Client Enrolled at Core Level (Core Level Placements)

- Code 100 Initial Assessment
- Code 101 Job Search and Placement
- Code 105 Follow-up

Client Enrolled at Intensive Level:

- Code 100- Initial Assessment
- Code 202 Full Development of an Individual Employment Plan
- Code 210 Internship (Optional)
- Code 207 Intensive Follow-up Services

Client Enrolled at Training Level:

- Code 100 Initial Assessment
- Code 202 Full Development of an Individual Employment Plan
- Code 301 Occupational Skill Training *or* Code 302 On-the-Job Training
- Code 207 Intensive Follow-up Services

<i>WIA CODES FOR OLDER YOUTH (Ages 19-21)</i>
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- The following codes should be selected for use [in Toolbox](#):

- **Code 511 Objective Assessment**
- **Code 510 Comprehensive Guidance/Counseling**
- **Code 512 Individual Service Strategies**
- **Code 505 Occupational Skill Training or Code 504 Work Experience**

Client Files: Separate client files will be maintained on CAP clients dually enrolled in CAP and WIA or another FEC Programs. Each case manager (WIA Case Manager and CAP Case Manager) is responsible for maintaining their client files and for sharing information with other case managers to ensure that the performance standards of each program are met.